

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

RICHARD W. GATES III,

Defendant.

)
)
)
)
)
)
)

Crim. No. 17-201-2 (ABJ)

FILED UNDER SEAL

**DEFENDANT RICHARD W. GATES III'S UNOPPOSED MOTION FOR LEAVE
TO FILE UNDER SEAL EXHIBIT 1 TO HIS MOTION FOR PERMISSION TO
TRAVEL**

Richard W. Gates III, by and through counsel, hereby moves this Court for leave to file under seal Exhibit 1 to his Unopposed Motion for Permission to Travel. Despite the general policy that public access to judicial proceedings and judicial records is important to the proper functioning of our justice system, there are compelling reasons and good cause in this instance why Exhibit 1 should not be publicly disclosed. Exhibit 1 includes specific details about a trip Mr. Gates proposes to take. The proposed disclosure will sufficiently alert the public, but will not create unwarranted risk to Mr. Gates or his family regarding their location. The Court has noted on more than one occasion that this case is subject to substantial publicity and media coverage, and that the addresses of the events should be protected.

WHEREFORE, Mr. Gates hereby respectfully moves this Court for leave to file under seal Exhibit 1 to his Unopposed Motion for Permission to Travel. A draft order is attached.

Respectfully submitted,

/s/Thomas C. Green

Thomas C. Green

D.C. Bar No. 14498

Sidley Austin LLP

1501 K Street, N.W.

Washington, DC 20005

tcgreen@sidley.com

(202) 736-8069 (telephone)

(202) 736-8711 (fax)

Attorney for Richard W. Gates III